# UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In re

CUSTOMS AND TAX ADMINISTRATION OF THE KINGDOM OF DENMARK (SKATTEFORVALTNINGEN) TAX REFUND SCHEME LITIGATION MASTER DOCKET

18-md-02865-LAK

This document relates to: The cases identified in

Appendix A.

MOTION FOR ISSUANCE OF A REQUEST FOR INTERNATIONAL JUDICIAL ASSISTANCE TO OBTAIN EVIDENCE IN DENMARK

PLEASE TAKE NOTICE that the undersigned attorneys for the individual and entity defendants identified in Appendix A (collectively, "Defendants"), will apply before the Honorable Lewis A. Kaplan of the Southern District of New York at the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, 10007, at a time and date to be determined by the Court, for the issuance of a Request for International Judicial Assistance Pursuant to the Hague Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil and Commercial Matters and 28 U.S.C. § 1781(b)(2). In support of this motion, Defendants rely upon the accompanying Memorandum of Law and Declaration of Sharon L. McCarthy dated February 15, 2021 and the exhibits attached thereto.

Dated: New York, New York February 15, 2021

Respectfully submitted,

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### APPENDIX A

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Nicholas S. Bahnsen   19-cv-01906   19-cv-01894   19-cv-01894   19-cv-01894   19-cv-01894   19-cv-01894   19-cv-01811   19-cv-01813   19-cv-01893   19-cv-01866   19-cv-01893   19-cv-01866   19-cv-01866   19-cv-01866   19-cv-01866   19-cv-01866   19-cv-01893   19-cv-01866   19-cv-01866   19-cv-01866   19-cv-01866   19-cv-01866   19-cv-01866   19-cv-01894   19-cv-01866   19-cv-01866   19-cv-01866   19-cv-01894   19-cv-01866   19-cv-		· ·	19-cy-01865
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Bernina Pension Plan Trust 19-cv-10713	Bernina Pension Plan Trust		19-cv-10713
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Management LLC Roth 401(K) Plan		
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Voojo Productions LLC Roth 401(K) Plan		19-cv-01873
Xiphias LLC Pension Plan		19-cv-01924
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Jocelyn Markowitz		19-cv-01904
Avanix Management LLC Roth 401(K) Plan		19-cv-01867

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Rob Klugman	Mark D. Allison	18-cv-07828
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Ballast Ventures LLC Roth		1:19-cv-01781
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Investments LLC Roth		
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Albedo Management LLC Roth 401(K) Plan	1:19-cv-01785
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Fairlie Investments LLC Roth 401(K) Plan	1:19-cv-01791
First Ascent Worldwide LLC Roth 401(K) Plan	1:19-cv-01792
Battu Holdings LLC Roth 401(K) Plan	1:19-cv-01794
Cantata Industries LLC Roth 401(K) Plan	1:19-cv-01798
Crucible Ventures LLC Roth 401(K) Plan	1:19-cv-01800
Monomer Industries LLC Roth 401(K) Plan	1:19-cv-01801
Limelight Global Productions LLC Roth 401(K) Plan	1:19-cv-01803
Loggerhead Services LLC Roth 401(K) Plan	1:19-cv-01806
PAB Facilities Global LLC Roth 401(K) Plan	1:19-cv-01808
Plumrose Industries LLC Roth 401(K) Plan	1:19-cv-01809
Pinax Holdings LLC Roth 401(K) Plan	1:19-cv-01810
Roadcraft Technologies LLC Roth 401(K) Plan	1:19-cv-01812
Sternway Logistics LLC Roth 401(K) Plan	1:19-cv-01813

Trailing Edge Productions LLC Roth 401(K) Plan		1:19-cv-01815
True Wind Investments LLC Roth 401(K) Plan		1:19-cv-01818
Eclouge Industry LLC Roth 401(K) Plan		1:19-cv-01870
Vanderlee Technologies Pension Plan		1:19-cv-01918
Vanderlee Technologies Pension Plan Trust		1:19-cv-01918
Cedar Hill Capital Investments LLC Roth 401(K) Plan		1:19-cv-01922
Green Scale Management LLC Roth 401(K) Plan		1:19-cv-01926
Fulcrum Productions LLC Roth 401(K) Plan		1:19-cv-01928
Keystone Technologies LLC Roth 401(K) Plan		1:19-cv-01929
Tumba Systems LLC Roth 401(K) Plan		1:19-cv-01931
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Acer Investment Group LLC	John C. Blessington	18-cv-09841
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	State Street Financial Center	18-cv-09/9/
	One Lincoln Street	18-cv-09837
		18-cv-0983/ 18-cv-09838
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	F: 617.261.3175	18-cv-09839
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	E: john.blessington@klgates.com	18-cv-05053
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Kamco Investments Inc.		
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Kamco LP Profit Sharing		
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Linden Associates Defined		
Benefit Plan		
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Moira Associates LLC 401K		
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Robert Crema		
Stacey Kaminer		18-cv-09841
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		18-cv-09836
		18-cv-09837
Alexander Jamie Mitchell III		18-cv-09839
Alexander Janne Mitchen III		16-67-09639
David Schulman		18-cv-10100
Joan Schulman		18-cv-09840
Darren Wittwer		18-cv-09838
Burren Wittwei		10 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0 0
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Sheldon Goldstein	Martin H. Kaplan	18-cv-5053
	Kari Parks	
Scott Goldstein	Gusrae Kaplan Nusbaum PLLC	
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